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June 22, 2001

Document Control Office (DCO)
East Tower Room GO99
Waterside Mall
401 M Street, SW.
Washington, DC 20460

RE: Sponsorship of alpha-Pinene in the Voluntary Children's Chemical Evaluation Program
Document Control Number: OPPTS-00274D; CAS Number 80-56-8

Dear Administrator Whitman,

Millennium Chemicals agrees to participate in Phase I of the Pilot Program of the Voluntary Children's Chemical Evaluation Program (VCCEP) as a member of the Terpene Consortium (part of the Flavor and Fragrance HPV Consortia, Inc). Millennium Chemicals is sponsoring, along with other select members of aforementioned consortium, alpha-pinene (CAS Number 80-56-8).

Millennium Chemicals is a diversified manufacturer of pigments, acetyl derivatives and flavor and fragrance materials from turpentine. As such we own the largest refinery for isolating alpha pinene from turpentine in the US. We are actively supporting the voluntary High Production Chemical (HPV) Initiative Chemical Right to Know Program for the chemicals we produce. We are members of the Methanol Institute (formerly American Methanol Institute) consortium (Methanol), the ACC Acetic Acid and Salts Panel (Acetic Acid), and the Flavor and Fragrance HPV Consortia, Inc (33 Chemicals).

It is important to recognize how ubiquitous alpha Pinene is in nature. It is present in fruits and vegetables that we eat and in the ambient atmosphere. Most vegetation, particularly the conifers; produce alpha pinene and emit it continuously. One published study estimates the world wide biogenic emissions of alpha at 31,000,000 tonnes per annum. In contrast Millennium Chemicals isolates approximately 28,000 tonnes per year of which only a small fraction is emitted into the environment.

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Millennium and other member companies in the Terpene Consortium have agreed that alpha pinene is an important chemical to the Flavor and Fragrance Industry and have also agreed to use the Terpene Consortium as their agent.

The sponsorship of alpha-pinene under Phase I of the VCCEP Pilot Program will be made under the following specific conditions:

- 1) The responsibilities of the Terpene Consortium will be restricted to a) acceptable completion of testing requirements of the HPV Program and, b) collection of relevant exposure data, and c) preparation of a risk assessment.
- 2) The data from the chemical category designated terpenoid hydrocarbons-pinene group in the HPV Program may be used to complete data requirements under Tier I of the VCCEP.
- 3) The study protocols including routes of administration used in the tests in the HPV Program are acceptable for completion of Tier I testing in VCCEP.
- 4) Because of the vast preponderance of biogenic over anthropogenic generation of this material, the Terpene Consortium limits its commitment to Phase I level of the VCCEP. Should the peer review group decide to carry out studies in Phase II or III of the program, a different means of sponsorship will have to be developed that takes into account the biogenic generation of this material.

The Terpene Consortium and its member companies understand that sponsorship entails: assembling and reviewing available test data, development of exposure estimates, preparation of an appropriate risk assessment, and, where needed, conducting additional testing in the time frame established by the Chemical Right-to-Know Program. The Terpene Consortium will begin development of Tier I hazard data and collection of exposure information by December 31, 2001. The anticipated date for submission of a Tier I assessment including additional testing, exposure assessment and risk assessment will be December 31, 2002.

Dr. Timothy Adams is the Terpene Consortium's technical contact; he can be reached at 202-331-2325; fax 202-463-8998; email tadams@therobertsgroup.net. Mr. Frederick M. Kershner, Director of Industrial Hygiene and Health, is Millennium Chemicals' technical contact and may be reached at (410) 229-4541; fax: (410) 229-4535; e-mail: fkershner@mic-usa.com.

Sincerely,

John C. Day
Vice President – Responsible Care® and Quality

cc: William M. Landuyt – Millennium Chemicals
Lee Salamone – American Chemistry Council
Glen Roberts – Flavor and Fragrance HPV Consortia, Inc.